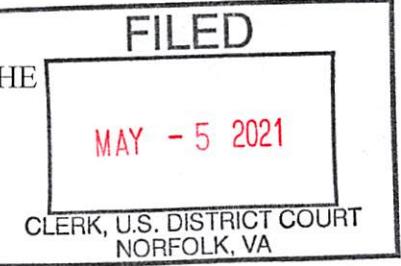


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

UNITED STATES OF AMERICA

v.

DAVID M. CARVER,  
Defendant.



Case No. 2:21cr 53

18 U.S.C. § 2252(a)(4)(B), (b)(2)  
Possession of Images Depicting Minors  
Engaging in Sexually Explicit Conduct

18 U.S.C. § 2253  
Criminal Forfeiture

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT

On or about November 4, 2020, the defendant, DAVID M. CARVER, in Norfolk, Virginia, within the Eastern District of Virginia, and elsewhere, did, knowingly and intentionally possess a 2 Terabyte Western Digital external hard drive, which was manufactured outside the Commonwealth of Virginia, which contained a visual depiction of a minor engaging in sexually explicit conduct using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed, shipped, and transported so shipped and transported by any means, including by computer, and the production of such visual depiction involved the use of a minor, including a prepubescent minor and a minor who had not yet attained the 12 years of age, engaging in sexually explicit conduct, and such visual depiction is of such conduct.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B)).

2021 MAY -5 P 229  
CLERK US DISTRICT COURT  
NORFOLK, VIRGINIA

RECEIVED

**CRIMINAL FORFEITURE**

A. Defendant DAVID M. CARVER, upon conviction of one or more counts in this Information, as part of the sentencing of the defendant pursuant to Fed.R.Crim.P. 32.2, shall forfeit to the United States:

1. Any and all matter which contains child pornography or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 produced, transported, mailed, shipped, distributed or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

2. Any and all property, real and personal, used or intended to be used in any manner or part to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property;

3. Any and all property, real and personal, constituting, derived from, or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*; and

B. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

C. The property subject to forfeiture includes, but is not limited to, the following items:

1. One (1) 2TB Western Digital My Passport Ultra external hard drive;
2. One (1) 500 GB Asus Laptop with serial number: C6N0AS198937232;

(All pursuant to Title 18, United States Code, Sections 2253; Title 21, United States Code, Section 853(p).)

Respectfully submitted,

Raj Parekh  
Acting United States Attorney

Date: May 4, 2021

By:   
Matthew J. Heck  
Special Assistant United States Attorney